

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

PAUL LONARDO,
on behalf of himself and
all others similarly situated,

and

DANTE FREZZA,
on behalf of himself and
all others similarly situated,

and

JOSEPH FELDMAN
on behalf of himself and
and all others similarly situated

Plaintiffs

VS.

THE TRAVELERS INDEMNITY
COMPANY

and

THE STANDARD FIRE INSURANCE
COMPANY

Defendants

CASE NO. 06 CV962

JUDGE KATHLEEN M. O'MALLEY

**AFFIDAVIT OF PAUL LONARDO IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT AND CLASS COUNSELS'
PETITION FOR AWARD OF ATTORNEYS' FEES, EXPENSES AND INCENTIVE
AWARDS TO CLASS REPRESENTATIVES**

I, Paul Lonardo, under penalty of perjury do hereby submit this affidavit and state as follows:

1. My name is Paul Lonardo. I am a Class Representative in the case styled *Paul Lonardo, et al. v. The Travelers Indemnity Company*, U.S. District Court, N.E. Ohio, Case No.



06 CV962. From approximately February 2000 and continuing for a period of years, I was insured under a Travelers homeowners insurance policy with a one year policy period that began and ended on June 15th, issued by The Standard Fire Insurance Company. I purchased my policy through an independent agent.

2. I was never advised of a lower priced Travelers policy and if I had been told of the availability of a lower-priced policy available from Travelers that offered the same coverage and the same service, I would have purchased the lower priced policy.

3. I have not been promised anything in connection with this litigation.

4. I have actively participated in this case by reviewing the pleadings, responding to discovery requests, being deposed, having my wife deposed, and speaking with Daniel Goetz, one of my attorneys, multiple times on the telephone and/or in person.

5. Mr. Goetz and Mr. Kennedy kept me advised during the settlement negotiations and they sought my input.

6. I reviewed the Settlement Agreement and all of the exhibits to the Settlement Agreement. In my opinion, the Settlement is fair and reasonable to all parties, especially all class members.

7. FURTHER AFFIANT SAYETH NOT.


PAUL LONARDO

SWORN TO and subscribed in my presence this 20 day of January, 2010.


NOTARY PUBLIC

